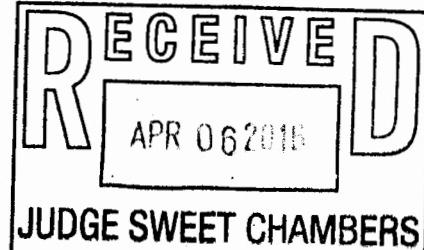




ZACHARY W. CARTER
Corporation Counsel

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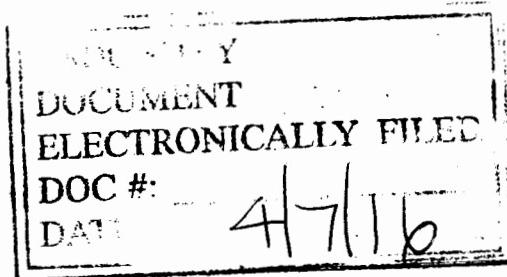


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April 6, 2016

BY ECF & EMAIL
(Talia_Nissimyan@nysd.uscourts.gov)

Honorable Robert W. Sweet
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007



Re: Schoolcraft v. Jamaica Hospital Medical Center, et al.
10-CV-6005 (RWS)

Your Honor:

I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, representing the motion respondent City of New York (the "City"), in connection with the above-captioned matter.

I write to request permission to file an oversize Memorandum of Law of 73 pages, exclusive of exhibits, in support of the City of New York's opposition to plaintiff's fee application. The opposition is due April 8, 2016. Plaintiff's counsel consent to this request, while noting that they are likely to request permission to file an oversize Reply brief as a result.

The additional pages of briefing are required because of the volume of plaintiff's submissions and the number of issues arising from it. Plaintiffs' counsel filed combined Memoranda of Law of approximately 45 pages in two separate documents, and several argumentative declarations or affirmations, including citations to case law, of approximately 85 pages, plus several hundred pages of time and expense charges (containing approximately 5240 discrete time entries). The City believes that requested size of the Memorandum is necessary to fully address the plaintiff's \$4.5 million fee claim.

*To ordered
Sweet
DVS/J
4-6-16*

Sweet, J.
April 6, 2016
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We thank the Court for its consideration in this matter.

Respectfully submitted,

/s/

Alan H. Scheiner
Senior Counsel
Special Federal Litigation Division

cc: All counsel by ECF